

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(Richmond Division)**

ERIC DANTE PITT, for himself  
And on behalf of all similarly situated  
individuals,

Plaintiff,

v.

KMART CORPORATION,  
A wholly owned subsidiary of Sears  
Holdings Corporation,

and

SEARS HOLDINGS CORPORATION,

Defendants.

Civil Action No. 3:11-cv-697

**NOTICE OF COMPLIANCE WITH 28 U.S.C. § 1715**

Defendants hereby provide notice that, on February 4, 2013, Defendants served the notifications required by 28 U.S.C. § 1715 via overnight mail on the Attorney General of the United States and the attorneys general of the 50 states, the District of Columbia, and all United States territories in which one or more class members reside. The notices address the proposed Settlement Agreement and Release filed with the Court on January 25, 2013.

**KMART CORPORATION &  
SEARS HOLDINGS CORPORATION**

By: /s/ John C. Lynch  
Of Counsel

John C. Lynch  
Virginia State Bar No. 39267  
*Attorney for Defendants*  
TROUTMAN SANDERS LLP  
222 Central Park Ave., Suite 2000  
Virginia Beach, Virginia 23462  
Telephone: (757) 687-7765  
Facsimile: (757) 687-1504  
Email: [john.lynch@troutmansanders.com](mailto:john.lynch@troutmansanders.com)

Alan D. Wingfield  
Virginia State Bar No. 27489  
*Attorney for Defendants.*  
TROUTMAN SANDERS LLP  
1001 Haxall Point (23219)  
P. O. Box 1122  
Richmond, VA 23218-1122  
Telephone: (804) 697-1350  
Facsimile: (804) 698-5172  
Email: [alan.wingfield@troutmansanders.com](mailto:alan.wingfield@troutmansanders.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on the 5th day of February, 2013, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following CM/ECF participants:

**Counsel for Plaintiff**

Christopher Colt North  
The Consumer and Employee Rights Law Firm  
751-A Thimble Shoals Blvd.  
Newport News, VA 23606  
[cnorthlaw@aol.com](mailto:cnorthlaw@aol.com)

William Leonard Downing  
The Consumer and Employee Rights Law Firm PC  
751 A Thimble Shoals Blvd  
Newport News, VA 23606  
Email: [wdowninglaw@aol.com](mailto:wdowninglaw@aol.com)

Leonard A. Bennett  
Consumer Litigation Associates  
763 J Clyde Morris Boulevard, Suite 1A  
Newport News, Virginia 23601  
Email: [lenbennett@cox.net](mailto:lenbennett@cox.net)

Susan Mary Rotkis  
Consumer Litigation Associates  
763 J Clyde Morris Boulevard, Suite 1A  
Newport News, VA 23601  
Email: [srotkis@clalegal.com](mailto:srotkis@clalegal.com)

/s/ John C. Lynch  
John C. Lynch  
Virginia State Bar No. 39267  
Attorney for Defendants  
TROUTMAN SANDERS LLP  
222 Central Park Ave., Suite 2000  
Virginia Beach, Virginia 23462  
Telephone: (757) 687-7765  
Facsimile: (757) 687-1504  
Email: [john.lynch@troutmansanders.com](mailto:john.lynch@troutmansanders.com)